

Exhibit A

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CITY CLERK
KING COUNTY
SUPERIOR COURT CLERK
SEATTLE, WA

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

ANDREA LISTER in her individual

capacity and family PLAINTIFF,

v.

COS, Prosecutors, Marshal(s) TBA

Seattle Police Dept + Officers TBA

King County Et, Al., KC Prosecutors

KC DAJD, EE's, Sargeants, CO's

John & Jill Doe(s), Public Defense TBA

DEFENDANTS

NO.

17-2-14474-8 SEA

SUMMONS (20 DAYS)

THE STATE OF WASHINGTON TO: the defendants named above.

A lawsuit has been started against you in the above-entitled court by

the above-entitled Plaintiff. Plaintiff's claim is stated in the written

complaint, a copy of which is served upon you with this summons.

In order to defend against this lawsuit, you must respond to the

complaint by stating your defense in writing, and by serving a copy upon the

undersigned person within twenty (20) days (if served within the State of

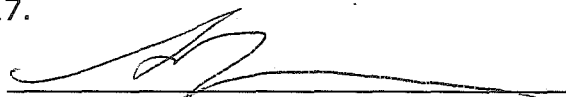
1 | Washington) or within sixty (60) days (if served outside the State of
2 | Washington) after the date of service on you of this Summons, excluding the
3 | day of service, or a default judgment may be entered against you without
4 | notice. A default judgment is one where plaintiff is entitled to what is asked
5 | for because you have not responded. If you serve a notice of appearance on
6 | the undersigned attorney, you are entitled to notice before a default
7 | judgment may be entered.

8 | If previously not filed, you may demand that the plaintiff file the
9 | lawsuit with the court. If you do so, the demand must be in writing and must
10 | must be served upon the person signing this summons. Within fourteen (14)
11 | days after you serve the demand, the plaintiff must file this lawsuit with the
12 | Court, or the service on you of this summons and complaint will be void.

13 | If you wish to seek the advice of an attorney in this matter, you should
14 | do so promptly so that your written response, if any, may be served on time.

15 | This summons is stated pursuant to Rule 4 of the Superior Court Civil
16 | Rules of the State of Washington.

17 | DATED June 4, 2017.

18 | 

19 | Andrea Lister, Attorney Pro-Se, Plaintiff

20 | email: todaysgirlfriday@gmail.com

21 | 1728 E. Olive Street #3-706

22 | Seattle, WA 98122

23 |

24 |

25 |

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF KING

ANDREA LISTER in her individual

capacity and family PLAINTIFF, NO.

v.

17-2-14474-037A

COS, Prosecutors, Marshal(s) TBA COMPLAINT FOR

Seattle Police Dept + Officers TBA DAMAGES

King County Et, Al., KC Prosecutors

KC DAJD, EE's, Sargeants, CO's

John & Jill Doe(s), Public Defense TBA

DEFENDANTS

COMES NOW Plaintiff ANDREA LISTER by and through herself

PRO-SE as the interim attorney of record and states and alleges as follows:

I. PARTIES, JURISDICTION, AND VENUE

1. The Plaintiff at all times relevant herein were the residents of Seattle, King County, Washington.

2. Defendant(s) on information and belief, and at all material times

1 | material hereto, Defendants all worked in the Municipality of doing business
2 | in Seattle, King County, Washington. All acts alleged herein were performed
3 | as policy of the above agencies and also individually, on behalf of, and in
4 | furtherance of their employment with the above agencies and actions of each
5 | is sued under the tortious claims method.

6 | 3. Between 01/01/05 and until presently, and on information and belief,
7 | experience and conduct of the above policies, procedures, loss of unlawful
8 | behaviors of the individuals collaboratively who conducted such treacherous
9 | acts and violations of harm, abuse, degradation, violence, embarrassment,
10 | loss of rights, loss of consortium, loss of income, loss of assets, court cases,
11 | civic liabilities, civil liberties, withholding pro-se status, loss of employment,
12 | violations of constitutional rights & protections and as a pre-trial detainee
13 | too many to list occurred towards wrongful arrest, conviction, incarceration
14 | and police, prosecutor, & judicial malfeasance of these resulting from the
15 | actions over the time specified and injustices occurring as a result. Loss of
16 | freedom, emotional distress, pain/suffering. The material events & tortuous
17 | conduct alleged herein occurred in Seattle, in King County, Washington.

18 | 5. Jurisdiction and venue are properly before the Court.

19 |
20 | **II. FACTS and III. CAUSES of ACTION**

21 | 6. Between the above dates, Andrea Lister was subjected to civil and
22 | criminal behaviors from employees of the above agencies, government victim
23 | municipalities/county and the powers of the State as she was actually the
24 | victim of Domestic Violence at the hands of Daniel Calvin Wiseman of West
25 | Seattle. She was subjected to horrible crimes of cruel and unusual

1 | punishments, not only including excessive solitary confinement, harsh
2 | conditions, but numerous violations of law as to pre-trial detainees, of
3 | statutes, regulation, and /or ordinance, policies, protocols, and conditions
4 | of confinement, health and welfare violations, lack of exercise, due care and
5 | duties which include, but are not limited to: exercising due care and caution
6 | as the conditions required; maintaining laws and safety of prisoners as
7 | detainees pre-trial required of a reasonable and prudent employee under
8 | the circumstances while operating as an employee within the City, County
9 | and State of Washington.

10| 7. As a direct and proximate result of the employees actions Andrea Lister
11| Plaintiff(s) sustained bodily injuries resulting in pain and suffering,
12| aggravation, inconvenience, emotional distress and disturbance, and
13| reduction in the capacity to enjoy life in the past, present, and possibly
14| future entitling Plaintiffs to recover general damages in the amounts not
15| now precisely known, but to be proven at the time of trial. As well as access
16| to competent counsel, proper healthcare and all other records and files.

17| 15. As a further direct and proximate cause of the tortuous acts of these
18| employees the Plaintiffs suffered the following only a partial stated list of
19| damages which also include, but are not limited to the following: property
20| damage; loss of use of property; past, present, future medical expenses;
21| past, present, future loss of income; reduction in earning capacity; loss of
22| consortium, permanent disability & impairment; medical out of pocket, other
23 | miscellaneous expenses related to the plaintiffs' injuries; costs & reasonable
24 | attorney's fees; & other costs of further damages as shall be proven at trial.

25 | **IV. LIMITED PHYSICIAN-PATIENT WAIVER**

1 | Plaintiffs hereby waives the physician-patient privilege only to the
2 | extent required by RCW 5.60.060, as limited by Plaintiffs' Constitutional
3 | Rights of Privacy, contractual rights of privacy, and the ethical obligations
4 | of physicians and attorneys not to engage in ex parte contact between the
5 | treating physician and the patient's legal adversaries or their representatives.

6 | **V. PRAYER FOR RELIEF**

7 | WHEREFORE, Plaintiffs pray for relief as follows:

- 8 | 1. For judgment against all defendants jointly and severably and as
9 | for general and special damages suffered by Plaintiff(s) in an amount to be
10 | determined at trial; specifying all available total possible damages by law.
11 | 2. For Plaintiffs' taxable costs and attorneys fees incurred herein; and
12 | also Pro-se fees
13 | 3. For such other and further relief as the court deems just.

14 | DATED June 4, 2017.



16 | Andrea Lister, Attorney Pro-Se, Plaintiff
17 | email: todaysgirlfriday@gmail.com
18 | 1728 E. Olive Street #3-706
19 | Seattle, WA 98122